

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

FIGHT FOR NEVADA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:20-cv-00837-RFB-EJY
)	
BARBARA CEGAVSKE, in her official capacity)	Judge: Hon. Richard F. Boulware, II
as the Secretary of State of Nevada,)	
)	Magistrate: Hon. Elayna J. Youchah
)	
Defendant.)	

**[PROPOSED] TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW
CAUSE AS TO WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Upon consideration of the Plaintiff's Emergency Motion for a Preliminary Injunction and/or Temporary Restraining Order, the Complaint, the Memorandum of Points and Authorities submitted in support thereof, the declaration submitted in support thereof, and notice having been given to Defendant Barbara Cegavske, and it appearing to the Court that Plaintiff will suffer immediate and irreparable injury for which they will have no adequate remedy at law if a temporary restraining order is not issued, that Defendant will suffer no harm if the requested temporary restraining order is granted, that Plaintiff enjoys a substantial likelihood that they will prevail on the merits of their claims when the merits are fully and finally adjudicated, and that the public interest will be served by issuance of a temporary restraining order, it is, accordingly, by this Court on this ____ day of May, 2020:

ORDERED that Plaintiff's Application for Temporary Restraining Order is hereby granted; and it is further

ORDERED that Defendant Barbara Cegavske, acting in her official capacity as Secretary

of State of Nevada, and any agents, employees, or representatives of her, or any other person or entity acting on behalf of or in concert with her, be, and hereby are, enjoined from requiring Plaintiff to submit the petitions for their campaign for the recall of public officer by May 14, 2020; and is further

ORDERED that the Defendant grant Plaintiff an extension of the deadline established by NRS 306.015(3) by an amount of days equal to the duration of Governor's Sisolak's "Declaration Of Emergency For COVID-19"; and is further

ORDERED that the Defendant, appear before this Court, located at 333 S Las Vegas Blvd., Las Vegas, NV 89101, on _____, at _____, or as soon thereafter as the matter may be heard, then and there to show cause, if she has any, why she and her agents, employees, or representatives of her, or any other person or entity acting on behalf of or in concert with her, should not be enjoined and restrained during the pendency of this action from requiring Plaintiff to submit the signatures for their campaign for the recall of public officer by May 14, 2020; it is further

ORDERED that the above Temporary Restraining Order is effective on Plaintiff's filing of an undertaking in the sum of \$ _____. This Order to Show Cause and supporting papers must be served on Defendant no later than _____ days before the date set for hearing, and proof of service shall be filed no later than _____ court days before the hearing. Any response or opposition to this Order to Show Cause must be filed and personally served on Plaintiff's counsel no later than _____ court days before the date set for hearing, and proof of service shall be filed no later than _____ court days before the hearing.

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Dated: _____

JUDGE OF THE UNITED STATES DISTRICT COURT